

J. LOHR

VINEYARDS&WINES



August 9, 2005

Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
Attn: Notice No. 49
P.O. Box 14412
Washington, DC 20044-4412

COMMENT 54

Dear Mr. Manfreda:

I strongly support the proposed change from 95% to 85% vintage dating. Almost 20 years ago I chaired the "varietal content" committee of Wine Institute in which, after long discussion and compromise, we (Wine Institute) recommended an increase in varietal content based on the narrowness of the appellation. TTB's predecessor approved those changes. I have long felt that at the time we also should have recommended the now-proposed change from 95% to 85% vintage dating or a similar proposal.

I first planted vineyards in 1972 and bonded J. Lohr Winery in 1974. I have been very active in local, regional, state and national winegrower organizations and am a cofounder of WineVision, which has as one of its goals to encourage responsible wine consumption as part of our American culture. Although we have made great strides in grape growing and winemaking these past 40 years, I am disappointed in the fact that US per capita consumption of wine has hardly changed during the same time period. I'm from South Dakota originally, and I maintain close ties to my roots. Many of my Midwestern friends still have difficulty enjoying our California wines, citing inconsistencies from vintage to vintage as one reason for their disappointment. They also find them too oaky, too alcoholic and changeable from year to year.

I've recently paid visits to Australia, Chile, Argentina, France and Spain in order to visit their wineries and taste their wines. These countries are all succeeding at making the best possible wines, but with a less cumbersome vintage dating policy than the US. It is obvious from tasting their vintages and then tasting bottled vintage dated wines that rather significant forward and backward vintages are added to the named vintage in order to gain a fresh fruit flavor or an aged complexity as well as better uniformity from vintage to vintage. Australians have proven their success in the US market – Spain, Chile and to some extent Argentina are all gearing up to sell very good wines in the \$10+ retail market – the sweet spot. It will be difficult for US wineries to compete globally on this uneven playing field.

Thus I feel it is high time we got competitive. Changing the vintage dating requirement from 95% to 85% is just one way we can encourage others to enjoy the pleasure of wine!

Sincerely,



Jerry Lohr
President / Owner, J. Lohr Vineyards & Wines